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ABSTRACT

The need for colleges and universities to develop standards of fair practice and academic integrity in providing adequate information to prospective students is discussed. The possibility of federal regulation in this area is critically analyzed. A "seller" and "consumer" assistance system, based on obligations to students and on educational principles, is recommended. Results of studies conducted by the National Task Force on Better Information for Student Choice and the Virginia State Council for Higher Education indicate that prospective postsecondary students value such information as more complete financial aid data, detailed descriptions of instructional programs and teaching effectiveness, and the relation of education to future careers. The role of the Center for Helping Improve Choice in Education (CHOICE) in promoting institutional participation in developing improved information is discussed. Agencies which might take prime responsibility for developing an effective consumer assistance system are suggested, including: (1) the higher education associations and accreditors; (2) a voluntary education service utility; (3) state agencies already involved in collecting and disseminating educational information; and (4) a new type of agency acceptable to both colleges and governmental bodies that would exercise responsibility and provide leadership. (SPG)

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ALTERNATIVES TO FEDERAL LEADERSHIP

IN

STUDENT CONSUMER INFORMATION

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ALTERNATIVES TO FEDERAL LEADERSHIP IN STUDENT CONSUMER INFORMATION

Joan S. Stark and Patrick T. Terenzini

The types of information supplied to prospective students by colleges and universities have recently received considerable attention from outside the academic community. Since 1975, when the need to account for student aid funds stimulated the Federal Interagency Committee on Education to label the postsecondary student a "consumer," the federal government has moved rapidly toward a centralized system intended to protect students from possibly misleading advertising by colleges and vocational schools. This new federal guardianship is lodged in eligibility requirements for participation in various student aid programs.

The call for more detailed information prior to a student's enrollment in postsecondary education stems largely from evidence that some financial aid recipients have made poor educational investments, ostensibly because they lacked adequate knowledge of the institution and its policies. Although the presumption that students will make wise investments if they possess certain types of information remains undemonstrated, the idea appeals to common sense and therefore has received wide acceptance.

Early assumptions concerning the items of information that might facilitate more rational student choices among educational opportunities

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were heavily based on proprietary school scandals involving federal loan defaults. These assumptions, now incorporated into law through the Education Amendments of 1976 and rules promulgated by the Office of Education, the Veterans Administration, and, for proprietary institutions, the Federal Trade Commission, require institutions to supply specific types of information to applicants. Except for those rules that deal directly with financial aid information and costs of attendance, however, there is little evidence that the mandated items follow either from a knowledge of students' decision-making processes or from generally accepted educational principles. Rather, the emerging system for regulating student information appears to be based on the supposition that, given the opportunity, colleges will neglect student welfare in favor of increasing institutional enrollments. Colleges and vocational schools are believed to demonstrate little concern for helping students make sound educational choices.

Federal lawmakers have been, and continue to be, strongly encouraged in their move toward more detailed information by student lobby groups and consumer advocates. These well-intentioned organizations have seized an opportunity to press for a variety of favored reforms that can be linked to consumer information, ranging from pro rata refund policies to mandatory evaluation of faculty by students. Although the current regulations applying to colleges and universities do not specify the precise content or format of the required information, the distinct possibility exists that more detailed specifications will be forthcoming. Indeed, this prospect has become more potent with the introduction of a bill in the 1977 Congress which, had it not died in committee, would

have placed colleges under the jurisdiction of the Federal Trade Commission.

State regulatory agencies and coordinating commissions, too, have begun to take a more active role in supervising the information colleges circulate. While some states, such as Oregon and Minnesota, have previously been involved in productive ventures to improve student choice, other states have acted belatedly to guard their traditional role as primary educational authorities from additional federal intrusion. One state, New York, has enacted the federal law nearly verbatim and has proposed considerably more detailed reporting formats for colleges. While these efforts have educational overtones, the student consumer information system that has begun to emerge at both state and federal levels is primarily intended to ensure that taxpayers' funds are spent for their intended purposes.

Collegiate institutions and their Washington representatives have been quick to criticize government initiatives and, in some cases, have successfully argued for a less stringent intepretation of the new laws than was originally contemplated. College representatives have protested that the new regulations are expensive, illegal, unfair, and interfere unduly in internal educational matters. Although most colleges admit that the information they provide might be expanded to help students make more informed decisions, the colleges themselves have so far done little to suggest constructive alternatives to the federal rules.

Perhaps the most valid argument against the new federal regulations is the one most seldom heard -- simply that the requirements do not provide a solution to the problems students face when choosing among colleges.

The new rules will be ineffective, not because they are expensive, illegal, unfair, or intrusive, nor because the government has insufficient personnel for adequate enforcement. They will be ineffective precisely because in their present form they are unlikely to help students make better choices. Not only is much of the required information largely irrelevant to educational choice, but the rules provide neither for the encouragement of new attitudes among students and institutions, nor for the development of positive relationships that already exist.

Students should be encouraged to view their prospective colleges as sources of assistance in decision-making, rather than as adversaries, and to judge institutions on educationally relevant criteria. Colleges must see the required information in terms of their clear professional obligations to students and in terms of their potential for enhancing the educational process. Unfortunately, as the current pseudo-support system for students becomes entrenched, students may begin to judge what is educationally important in light of the regulations issued. Students may ignore advice crucial to sound educational decisions, while colleges may begin to develop policies and practices to meet only minimal compliance standards. For institutions, under such circumstances, the "standard" could become doing as little as possible. Thus, the present system, which has involved neither students nor colleges in its conception, is not only unworkable, but has dangerous implications for education.

Increasing size and complexity of institutions, unexamined tradition, encroaching bureaucracy, and escalating competition for students in recent years may have caused college concern for student decisions to

be less obvious. But the threat of federal action has stimulated the discussion of alternative systems among colleges that are often slow to respond to changing times until external forces cause them to do so. Colleges are now conscious that they have not fully accepted the obligation of developing adequate information for prospective students.

There are many practical as well as educational reasons why colleges and universities desire to uphold standards of fair practice and academic integrity which far exceed the federal guidelines for supplying information to applicants. First, colleges are constantly studying their students and are best prepared to determine what information will be helpful to students in terms of each institution's unique environment. In a time of declining enrollments, colleges are anxious to maintain the public trust by accepting their responsibilities for assisting students. Second, there is considerable evidence that joint involvement of students and colleges in developing information materials given to prospective students can serve as an adaptive mechanism leading to institutional improvement. The concerted action of colleges and universities in providing better information for students is more likely to be cost-effective than the development of bureaucratic mechanisms for enforcing externally devised solutions.

To translate the good intentions of institutions into more fruitful advice for students, a "seller" and "consumer" <u>assistance</u> system, rather than an enforcement or protection system, is needed. Such a system must be based on obligations to students and on educational principles, rather than on vested interests and accountability requirements for

federal funds. Colleges must assume the responsibility for describing that information most needed for students to make wise educational decisions and for conveying to the public the importance of full utilization of the information in selecting among educational options. Such an assistance system must be developed through a process which is sufficiently flexible to evolve with changing times and conditions and which utilizes the best knowledge of colleges and their students in a cooperative venture. Most importantly, the information development process must encourage attention to the clearer specification of educational outcomes, and to the evaluation and improvement of educational quality based on well-documented criteria rather than on isolated incidents of student complaints.[1] Few such constructive goals of a consumer assistance system for postsecondary education are likely to be met by federal or state rules that rest on threats and penalties rather than on positive incentives.

In considering alternative systems for assisting students in obtaining and utilizing more adequate information for college choice, several important questions need to be answered, and several loci of responsibility might be identified as alternatives to further federal action. The questions include:

1. Can clear guidelines be developed to characterize information which is necessary, useful and usable by prospective students

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[1]The characteristics of such a system are given in more detail in The Many Faces of Educational Consumerism by Joan S. Stark and Associates, Lexington, Mass.: D.C. Heath, Inc., 1977, p.201.

of varied ages and backgrounds in choosing among educational institutions?

2. Will institutions cooperate in developing and adopting such guidelines and in determining appropriate roles for themselves and for government agencies?
3. Can the guidelines, cooperative spirit among colleges, and efforts of the many responsible agencies be coordinated in a workable system that will utilize available resources, energies and concerns constructively?
4. Can a system be structured that will distribute the responsibility for better educational information among agencies that deal with individuals at all levels of educational consideration, from childhood to adult?

Developing educationally meaningful information guidelines

Substantial progress has been made in determining what information is useful to students in decision-making. From 1975-1977, eleven postsecondary institutions and four resource agencies, constituted as a National Task Force on Better Information for Student Choice, cooperated in exploring this question. They conducted national and local surveys of student information needs, related these to information educators and students on campuses felt was important, attempted to develop the needed information for each institution, and experimented with the format which might make the data most useful to students.[2]

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[2]A report of the Task Force's activities and a handbook illustrating and analyzing its products will be published by the American Association for Higher Education in early 1978.

A somewhat similar project was conducted by the Virginia State Council for Higher Education during the same time period.

As a result of these studies, it is now clear that prospective postsecondary students value information which they believe is not presently available, including more complete financial aid information, detailed descriptions of instructional programs and teaching effectiveness, and the relation of education to future careers. It is also known that certain types of students, such as minorities and adults, have specific concerns often unaddressed by general information. Differences in the kinds of information that are most useful to students in considering institutions of diverse types have also been clarified.

Students do not, at present, view the proportion of entering students who complete programs at the institution as important in their considerations, nor are they particularly interested in reports of the experiences of enrolled students in many areas of campus life. Some educators, in contrast, recognize that student experiences do not always coincide with written policies and believe that students should be encouraged to consider both stated policies and behavioral reports from representative samples of enrolled students. As one Task Force member put it, for any given program or educational activity, applicants should know "How many students participate? To what effect? And what opinion have they of it afterward?"[3] In keeping with this view, the Better Information Task Force attempted to develop information to help

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[3]Theodore J. Marchese. "Better Information for Student Choice: The Basic Argument." Address delivered at the National Conference on Better Information for Student Choice, Washington, D.C., March, 1977.

students answer the question: "What is likely to happen to me if I enroll at this institution?" The information developed included clearer statements of policies, data that indicated actual student experiences, and reports of student views of college programs and services.

Although student self-reported needs can now be summarized with some accuracy, subject to institutional and personal variations, further research is needed to determine whether supplying this desired information or that viewed as important by educators or government officials will influence student decisions. Until such research has been conducted, the definition of "better information" will continue to be unclear and must include those items considered important by all three groups. Only continued cooperation among colleges in determining the impact of information when it is supplied to applicants can support a rationale for providing one type of information over another. Although the understanding of what information will help students make better decisions among colleges has taken quantum leaps in the past three years, much work remains to be done before colleges can claim to have fulfilled their responsibility in taking a leadership role in the information issue.

Will institutions cooperate?

The work of the National Task Force on Better Information for Student Choice illustrates one type of cooperation. The member institutions jointly addressed issues of student information needs and

delivery and modified basic components of their information systems in an effort to facilitate students' selection of a college. In general, however, each institution examined the information needs of its own applicants and constructed its own responses. Although the sharing of ideas was fruitful, no concerted effort was made in this preliminary venture to develop consistency in the types of information provided by the various schools and colleges participating.[4] Only near the conclusion of the project was sufficient evidence available to discuss meaningfully some of the types of information that are most important and might be developed in a consistent way to foster improved student choice.[5] Even at that time, it was clear that the importance of information varied with the type of college and final agreements would be difficult to achieve.

A new Center for Helping Organizations Improve Choice in Education (CHOICE) is now building on this early work by extending the guidelines begun by the Task Force and encouraging institutions to become involved in a cooperative project that will include both attempts to develop comparable information and a research design to determine whether the information influences student views. Although institutions involved in this new cooperative project will receive technical assistance, collegial

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[4]A major exception was a group of institutions, working under the guidance of the College Scholarship Service, that agreed upon guidelines for presenting financial aid information consistently. See Making It Count, College Entrance Examination Board, 1977.

[5]For a discussion of such items, see "Providing Comparable Information to Prospective Students," by O.T. Lenning, J.S. Stark, and P. Wishart. Working paper available from CHOICE, 227 Huntington Hall, Syracuse University.

support and data analysis services, they will be responsible (unlike the Task Force institutions) for funding the new information development on their own campuses after reaching agreements with similar colleges about ventures which might be tried cooperatively. Although only twenty institutions will be selected for the cooperative project in 1978-79, a linking consultant service will extend the activities to a much larger group of colleges during 1979-80.

Initial response to the CHOICE project indicates strong interest among colleges in facing the problem of better information for students. During the first six weeks of publicity, which reached 3200 collegiate institutions, approximately one-eighth took time to respond to a survey assessing their knowledge of the better information issue and soliciting information about activities on their campus. During the same time period, about 150 colleges have contacted CHOICE concerning participation in its cooperative project. These results indicate that colleges are generally aware of public concern for better information and are actively engaged in considering appropriate responses.

The strategy used by CHOICE to encourage colleges to develop better information cooperatively represents a radical departure from both the manner in which federal regulations were introduced and from similar dissemination and development projects in higher education. Perhaps most importantly, the usual funding incentives will not be provided to participating colleges. The CHOICE plan assumes that colleges will accept the challenge and responsibility of beginning to provide consistent information that is educationally meaningful in order that new information systems can be structured on sound knowledge of student needs. In addition, CHOICE has based its activities on

principles of organizational development and adoption of new ideas: the organization must see the relative advantages of the new approach over customary practice, be able to observe the results obtained by others who have adopted the new idea, find the new approach compatible with its goals and standards, view the new approach as reasonably simple to introduce in a limited setting, be able to obtain necessary assistance, and be able to implement the new idea on a pilot basis without major organizational restructuring.[6] These guidelines assume a willingness of colleges that possess substantial motivation to improve information for students to provide leadership for other institutions.

A workable consumer assistance system

The agencies which might take prime responsibility for developing an effective consumer assistance system are numerous. They include: (a) the higher education associations and accreditors, traditionally the standard bearers for colleges; (b) a voluntary educational service utility, such as the College Board; (c) state agencies already involved in collecting and disseminating educational information; (d) a new type of agency acceptable to both colleges and governmental bodies that would exercise responsibility and provide leadership. The three types of existing agencies mentioned above have, to some extent, been involved already.

For example, the American Council on Education has already urged colleges and universities to examine their information practices in light

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[6]See E. N. Rogers and F.F. Shoemaker, Communication of Innovations: A Cross Cultural Approach. New York: Free Press, 1971.

of changing times and new public demands.[7] In cooperation with the Council on Postsecondary Accreditation, ACE has been drafting a code of good practice for institutions in the areas of information and other college-student relationships. Such a code will increase consciousness of long-accepted responsibilities and is another step in a cooperative direction by established groups that already have the respect and support of colleges.

Several state level efforts are now underway that epitomize the type of concern for student information necessary in a workable system. Some of these projects have successfully involved colleges in their planning and execution of state-wide education directories. Oregon's educational and career information system is now being used as a model for an eight-state pilot project in occupational information, while New York is testing the usefulness of public libraries for supplying information to prospective students.

The College Board, the National Center for Higher Education Management Systems, and the Education Commission of the States all participated in the National Task Force on Better Information and have disseminated their findings about better information for students. As non-profit eudcational service agencies with considerable experience in college choice, one of these agencies could assume a leadership role, but their efforts might be hampered by the strong feeling of students that they respond more to college interests than to those of students.

A potentially useful mechanism not now in existence might be a

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[7] See New Expectations for Fair Practice, by Elaine H. El-Khawas, distributed free by the American Council on Education.

state agency which would allow constructive interaction between colleges and government, a flexible service orientation to students, and a broadly based governing arrangement involving all interested parties in policy formulation. The primary criterion of success for such a system is that student counseling become a primary and positive focus.

The work now being undertaken by CHOICE may lay the groundwork for such a model since 1) it involves the institutions directly in a self-improvement effort, based on educational concerns; 2) it fosters direct student involvement on each campus where those enrolled can be most effective in helping prospective students; and 3) it serves as a communication link between private and governmental agencies. A new system might merge the firm knowledge base and cooperative spirit among institutions that CHOICE is building with the concerns of state and federal authorities as well as those of students in a way that remains neutral and helpful.

One role CHOICE will play is that of stimulating thinking about such a system among both institutions and governmental groups. Currently, one possibility to be carefully considered is the newly proposed Educational Information Center system. At the same time that Congress adopted its regulatory approach to student information in the Education Amendments of 1976, it provided an opportunity for states to accept more responsibility for informing students about postsecondary opportunities. Congress authorized Educational Information Centers (EIC), to be funded jointly by the states and the federal government, and to be established within commuting distance of citizens in every state that submits a comprehensive plan for their establishment. Although the EIC mission is to provide

educational information, counseling and referral services regarding postsecondary education, the manner in which this will be accomplished and the sources of the information have not yet been defined. Such Educational Information Centers, unformed and unfettered by tradition or obligations to any institutional constituency, have great potential for creating a consumer assistance system.[8]

In late February, 1978, personnel charged with the responsibilities of planning for the EICs in over forty states met in Denver under the auspices of the Education Commission of the States, the College Board, the Institute for Educational Leadership, and the National Center for Educational Brokering. Topics of discussion included existing and potential models that could be used for or incorporated into the EICs, including state-wide telephone networks, computerized career information systems, adult community counseling centers and existing library units. The conference was directed at developing state-wide plans which embody various functions necessary for adequate dissemination of educational information, particularly to adult learners. With the exception of the data bases from which a computerized system can be constructed, little attention was given to the types, sources, or accuracy of information to be disseminated. Almost no mention was made of involving educational institutions in the activities of the proposed EICs.

Although the initial thrust of the EICs will undoubtedly be on collecting and dispensing information now available, the Centers might

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[8]Variations on this idea are found in Stark, op. cit.

undertake, in addition, the types of activities for which CHOICE is building models. The EICs, if properly staffed, could be involved in the continuous process of determining what information is essential to students of various types, in assisting colleges in the development of that information through on-campus efforts, in investigating the impact of the information on students, and in peer monitoring of the types of information being supplied by institutions.

Although the idea of supplying comparable information on a state-wide basis is more acceptable to colleges than a federal system, and while students are more likely to develop a sense of their own responsibility if the EICs take on a counseling thrust, the mistakes evident in the initial federal moves toward better information for student consumers should not be repeated as the EICs develop. The structuring of plans to involve the interest of colleges themselves in better student choice is essential to long-range success of a new educational advisory system.

As yet there is little awareness among colleges and universities concerning the planning of the EICs in most states. Neither have high school guidance counselors been asked to contribute the knowledge and experience they have acquired over many years of counseling students about postsecondary opportunities. Yet, the involvement of these groups in the cooperative setting of standards of comprehensiveness and accuracy in the information to be disseminated is crucial. The emergence of a new setting allows for utilization of the best that is known about producing attitude change among students and institutions and for creating a system

that can respond to changing needs. Such knowledge must, however, be consciously employed.

To the extent that colleges do not participate in the development of these important centers, their current interest in supplying improved information will not be used to best advantage, errors already entrenched in the federal information regulations may be compounded, and educators in traditional institutions may place limited value on the new information centers as aids in their work.

The public demand for accountability in providing information to prospective students and the provision for new agencies to serve this function implies that the professional obligation of colleges has not been met. Nevertheless, it is inappropriate for the Educational Information Centers to meet a public need for neutral information merely by dispensing those data published by institutions and commercial agencies without concern for thier accuracy or their helpfulness to students. Similarly, it is important that colleges and universities not abandon a potential leadership role in the continual improvement of information for students either because the counseling function has been assumed by an external agency or because they have met the letter of the law. The best thinking and commitment of all involved segments of the educational and governmental communities is necessary for an effective consumer assistance system in postsecondary education.